

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

UNITED STATES OF AMERICA,  
Plaintiff,

vs.

Case No.: 25-Cr-60128-WPD

MAIKAIL MALIK KNIGHT-LEWIS,  
Defendant.

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**UNOPPOSED MOTION FOR A  
PRE-PLEA PRESENTENCE INVESTIGATION REPORT**

COMES NOW, the defendant, MAIKAIL MALIK KNIGHT-LEWIS, and respectfully requests the Court order a pre-plea presentence investigation report to determine if Mr. Knight-Lewis qualifies for the “safety valve” under U.S.S.G. §5C1.2 and as grounds in support thereof the defense would state the following:

1. Mr. Knight-Lewis is charged in Count 1 of the Indictment with conspiracy to possess with intent to distribute twenty-eight (28) grams or more of a mixture and substance containing a detectable amount of cocaine base, in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(B)(iii). DE-53.
2. After a review of Mr. Knight-Lewis’ criminal history it is unclear if he qualifies for the “safety valve”. Since Mr. Knight-Lewis’ guidelines would be lower than the five year minimum mandatory term of imprisonment if he were to resolve this case, it is important for counsel to ascertain whether or not Mr. Knight-Lewis is subject to the five year minimum mandatory penalty in this case.

3. Counsel is requesting this Court order a limited pre-plea pre-sentence investigation report focusing on Mr. Knight-Lewis' criminal history and whether it would disqualify him for the "safety valve" prior to Mr. Knight-Lewis entering a plea in this case.

4. AUSA Joseph Cooley has no objection to this motion.

WHEREFORE Mr. Knight-Lewis requests this motion be granted.

Respectfully submitted,

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